

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**JOHNNY M. HUNT,**

**Plaintiff,  
v.**

**SOUTHERN BAPTIST CONVENTION;  
GUIDEPOST SOLUTIONS LLC; and  
EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION**

**Defendants.**

**Case No. 3:23-cv-00243**

**Judge Campbell  
Magistrate Judge Frensley**

**JURY DEMAND**

**NOTICE OF RESOLUTION REGARDING DOC. NOS. 168, 170, 174, AND 183 AND  
STIPULATION AS TO THE DEPOSITION OF JANE DOE**

By order dated April 11, 2024, this Court addressed issues raised in Jane Doe's Motions to Proceed Pseudonymously, for Leave to File Under Seal, and for Protective Order, Doc. Nos. 168, 170, 174, which relate to her deposition in this matter as a non-party witness.<sup>1</sup> See Doc. No. 187, Order dated April 11, 2024. This Court ordered that Jane Doe's deposition go forward on a date agreeable to all parties but no later than May 31, 2024, *id.* at 3, and in the interim, that Ms. Doe be referred to only by her pseudonym. The Court also directed counsel for the Plaintiff and Jane Doe to meet and confer to resolve the remaining issues raised in Jane Doe's Motions related to her pending deposition. *Id.* at 3, 4.

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<sup>1</sup> The Court also denied Jane Doe's Motion to Expedite and for Emergency Relief (Doc. No. 172) and Plaintiff's motion to strike (Doc. No. 181). Doc. No. 187, at 4-5.

After meeting and conferring, Plaintiff and Jane Doe, and the other parties to the litigation agreed to the following resolution of the disputes raised by Jane Doe's motions, Doc. Nos. 168, 170, 174, and Plaintiff's motion to seal (Doc. No. 183):<sup>2</sup>

1. Jane Doe, Plaintiff, and Defendants agree that Ms. Doe will only be referred to in all filings in this Court, as well as in private correspondence between or among counsel for reducing the Court's time related to redactions and sealing, as the pseudonym "Jane Doe" or "Ms. Doe" and further, if Jane Doe's name and/or identifying information is otherwise on a document filed with this Court, the name and information will be redacted. Jane Doe, Plaintiff, and Defendants further stipulate and agree that the use of Jane Doe does not create an inference of any kind or nature concerning the events at issue in this case.
2. Jane Doe's deposition will proceed on May 22, 2024, at 9:00 a.m. EST in Orlando, Florida at a location agreed among counsel to Jane Doe, Plaintiff, and Defendants.
3. Jane Doe's deposition will not exceed four hours with questioning time for the Defendants (distributed as agreed among them) not to exceed two hours and questioning time for the Plaintiff not to exceed two hours. Total deposition time and party questioning time are each inclusive of direct, redirect and cross-examination questioning by parties other than Jane Doe's counsel, but exclusive of breaks and time otherwise off the record.
4. At Jane Doe's deposition, each Defendant will be permitted to have one individual present as a client representative and one individual attorney representing that party and Plaintiff will be permitted to have two attorneys present.

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<sup>2</sup> The parties request that the Court grant Jane Doe's Motion to Proceed Pseudonymously (Doc. No. 168) as unopposed, deny as moot Jane Doe Motion for Protective Order (Doc. 170), and grant Jane Doe's and Plaintiff's motions to seal as unopposed. Doc. Nos. 174 and 183.

5. Plaintiff Hunt will only be present remotely in such a way as he is not visible to Jane Doe and Jane Doe is not visible to him. Plaintiff Hunt will only speak privately with his counsel and not openly to be heard by Jane Doe. Plaintiff Hunt will be the only individual present at his location for his remote participation.
6. Other than the official video recording or as needed by the court reporter, no individual will video record, audio record, or photograph all or any portion of Jane Doe's deposition.
7. The Second Amended Agreed Protective Order (Doc. No. 153) (or any future amendments thereof adopted by the Court) will otherwise control related to the transcript, video recording, and any and all exhibits related to Jane Doe's deposition or testimony in this case.
8. Nothing herein precludes Jane Doe from any future motions related to the sealing and/or any appropriate designation pursuant to the Second Amended Agreed Protective Order (Doc. No. 153) or otherwise of her deposition transcript, exhibits, and/or video recording or any future testimony at trial or otherwise.

Stipulated and Agreed to this 23rd day of April, 2024.

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that on **April 23, 2024**, I electronically filed a copy of the foregoing with the Clerk of Court for the U.S. District Court Middle District of Tennessee through the Court's Electronic Case Filing System, which will automatically serve all counsel of record listed below.

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